

James W. Boyan III
PASHMAN STEIN WALDER HAYDEN
Court Plaza South
21 Main Street, Suite 200
Hackensack, New Jersey 07601
(201) 488-8200
Attorneys for Defendants
Gannett Co., Inc., Gannett Satellite
Information Network, LLC, LocalIQ, LLC
and Jeremiah Martin

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANTOINETTE FAMULARE,

Plaintiff,

v.

GANNETT CO., INC., GANNETT
SATELLITE INFORMATION NETWORK,
LLC AND GANNETT SATELLITE
INFORMATION NETWORK, Inc. d/b/a USA
TODAY and USA NETWORK; LocalIQ,
LLC; Jeremiah Martin, individually

Defendants.

Civil Action No.:

**APPLICATION FOR AN ORDER
EXTENDING THE TIME TO ANSWER,
MOVE, OR OTHERWISE RESPOND TO
THE COMPLAINT**

Application is hereby made pursuant to Local Civil Rule 6.1(b) for a Clerk's Order extending the time within which Defendants Gannett Co., Inc., Gannett Satellite Information Network, LLC, LocalIQ, LLC and Jeremiah Martin, may answer, move, or otherwise respond to the Complaint filed by Plaintiff herein by 14 days. It is represented that:

1. No previous extension of time to answer, move, or otherwise respond to the Complaint has been obtained by Defendants.

2. On October 6, 2020, Defendants filed a Notice of Removal removing the Complaint from the Superior Court of New Jersey to the District of New Jersey.

4. Pursuant to Fed R. Civ. P. 81(c)(2), Defendants' time to respond to the Complaint expires on October 13, 2020.

5. A 14-day extension of time to respond pursuant to Local Civil Rule 6.1(b) would extend Defendants' time to answer, move, or otherwise respond to the Complaint to October 27, 2020.

DATED: OCTOBER 6, 2020

PASHMAN STEIN WALDER HAYDEN
Court Plaza South
21 Main Street, Suite 200
Hackensack, NJ 07601
Tel: 201) 488-8200
Fax: (201) 488-5556
jboyan@pashmanstein.com

/s/ James W. Boyan III
JAMES W. BOYAN III